

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

ANDREW J. SMITH, *pro se*,
Plaintiff

v.

PETER F. NERONHA; and, **GINA RAIMONDO**,
Defendants

C.A. No. 1:19-cv-00029-JJM-LDA

JURY TRIAL DEMANDED

**STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

NOW COME Defendants Peter F. Neronha, Rhode Island Attorney General ("Attorney General") and Gina Raimondo, Governor of the State of Rhode Island ("Governor Raimondo") (collectively, the "State" or "State Defendants") and request an additional ten (10) days or up to and including March 15, 2019 to answer or otherwise respond to Plaintiff's Complaint (ECF No. 1). State Defendants request the additional time as the Complaint and exhibits are twenty-eight (28) pages in length and involve significant procedural history, including a related divorce proceeding pending before the Rhode Island Family Court, a related criminal matter pending before the Rhode Island Superior Court, several related petitions for writs of *certiorari* to the Rhode Island Supreme Court. Additionally, counsel requests the extension due to the press of business in cases before the District Court and State courts.

WHEREFORE, State Defendants pray that this motion for extension of time is granted and the State Defendants given up to and including March 15, 2019 to file their responsive pleading to the Complaint.

Respectfully Submitted,

PETER F. NERONHA, ATTORNEY GENERAL
GINA RAIMONDO, GOVERNOR,
by their attorney,

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Justin Sullivan

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, March 04, 2019 I filed the within document via the ECF filing system and that a copy is available for viewing and downloading. I further certify that on Monday, March 04, 2019 I mailed a true and accurate copy of the within document via U.S. First Class mail, postage prepaid, to the following:

Andrew J. Smith, pro se (ID#152162)
Medium Security BR-5B
P.O. Box 8274
Cranston, RI 02920

/s/Justin Sullivan
